

REMARKS

Claims 1-33 are pending in the application. Claims 1-18 have been variously rejected under 35 U.S.C. §§ 103. Claims 19-33 have herein been added and are fully supported by the specification. The Summary and Title of the specification have been amended to clarify the scope of the invention. No new matter has been added to the prosecution of this application. For the reasons stated below, Applicants assert that all claims are now in condition for allowance.

35 U.S.C. § 103 Rejections

Claims 1-18 have been rejected under 35 U.S.C. § 103 as being unpatentable over Buchanan et al. (US Patent 5,267,155) in view of Edwards et al. (US Patent 5,410,551) and further in view of Dauerer et al. (US Patent 5,469,576). Applicants respectfully traverse these rejections. MPEP 2143 provides in part, "To establish a prima facie case of obviousness...the prior art reference...must teach or suggest all the claim limitations." (emphasis added). Because the cited references alone or in combination fail to teach or suggest all of the claim limitations, Applicants respectfully request that the §103 rejections be withdrawn.

Cited Art:

Edwards et al. (US 5,410,155), hereinafter Edwards, discloses verifying a proper interconnection of an interconnect network, by introducing a transitory test signal at a first node of a network within a system under test. A search is made of all other system nodes for responsive transitions. A comparison is made between the addresses of nodes where transitions are observed within a predetermined time span and the addresses of nodes where transitions are expected. The predetermined time span is adjusted to detect missing or miswired line-conditioning components. The invention is directed to a method and apparatus for determining whether proper interconnections are made between the components of an electronic system.

Buchanan et al. (US Patent 5,267,155), hereinafter Buchanan, discloses a document generation system for enhancing or replacing the dictation and transcription process. More particularly, a computer-based documentation system is provided which processes document templates in conjunction with pre-defined character strings to generate user-defined reports or documents. Each document template is composed of "boiler plate" text and "holes". A system and method are described for controlling, via a relational database, the selection of pre-defined character

strings to be inserted into document template "holes". A second method is described for inserting user-defined or concatenated character strings into selected document template "holes".

Dauerer et al. (US Patent 5,469,576), hereinafter Dauerer, discloses an improved file access controller for a data processing system, and a method for the use thereof, and more particularly, an improved front end system for a file access control system. The referenced improvement is particularly useful for security audits and system maintenance of the file access controller. The improvement comprises an apparatus and method for retrieving data describing authorized users which is stored within the file access controller, acquiring data describing users which is obtained from at least one other file system, comparing and sorting user data retrieved from the controller with user data obtained from the other file system so as to detect any mismatched data, resolving at least a portion of any mismatches by updating user data from the controller with data obtained from the other file system, combining the matched data and updated data and recording the combined data within the file access controller, and reporting any detected mismatched and non-updated data describing users.

Cited Art Distinguished:

With respect to claims 1, 7, and 13, the Examiner has cited Buchanan in view of Edwards. In particular, the Examiner has acknowledged that Buchanan fails to teach the elements:

- (c) verifying that all records to be loaded match the data management template; and
- (e) compiling a report of records that match the data management template and records that do not match the data management template.

The Examiner has asserted that Edwards teaches elements (c) and (e) above by detecting mismatches between two lists of data items obtained as a result of determining whether proper interconnections are made between the hardwired components of an electronic system.

To rely on a reference under U.S.C. 103, the reference must be analogous art. The applicant contends that Edwards is not analogous art. A person of ordinary skill in the art (of writing data base software) would not have reasonably expected to solve the problem of *verifying that all records to be loaded match a data management template* by considering a reference dealing with *determining whether proper hardware interconnections are made between components of an electronic system*. Further, the teaching in Edwards is of little value to a data base software programmer, since Edwards discloses a validation process involving only the comparison of two simple lists of numerical data [Edwards Fig. 1A, items 160, 170. Also col. 26 lines 60-68]. In contrast, validation in the

applicants' invention, for example, could include eliminating "*the insertion of erroneous data by enforcing business rules/requirements and ensuring that referential integrity, codependency, primary key, required field, default field, sequence number, and hard-coded field checks are met*" [applicants' unamended specification, page 24 lines 4-7]. Applicants further contend that if Edwards is disqualified from consideration as non-analogous art, Buchanan is insufficient to teach all the elements of claims 1, 7, and 13, and a *prima facie* case of obviousness cannot be supported.

Applicants also contend that a *prima facie* case of obviousness has not been supported by the examiner because there is no motivation to combine the two references. There is no suggestion in Buchanan that a data validation process is necessary or desired, since the templates described in Buchanan are utilized only to create documents, and do not serve as templates for storing data in a database. "*Relational databases are used advantageously to manage the document templates and the phrases used to replace variables in the templates for documents generated within document generation system I*" [Buchanan col. 5, lines 39-42] There is also no motivation to combine the teachings of Edwards because, as argued above, the validation process described in Edwards is inadequate to validate data in the complex data bases as described in Buchanan.

Lastly, the applicants contend that a *prima facie* case of obviousness has not been supported by the Examiner in that all elements of claims 1, 7, and 13 are not taught by the disclosed art. Although not explicitly stated, the Examiner apparently contends that Buchanan teaches elements (a), (b), and (d) of the referenced claims. Specifically:

- (a) receiving a plurality of records to be loaded in a database;
- (b) choosing a data management template corresponding to the records;
- (d) sending the records to a database for loading in the database upon validation that the records match the data management template;

With respect to element (d), Buchanan does not disclose this element since there is no validation process described in Buchanan, and that Buchanan in view of Edwards does not disclose this element.

In view of the arguments presented above, applicants further contend that element (c) is not disclosed in Edwards because the validation process described in Edwards is inadequate to validate data in complex data bases. Since the Examiner has acknowledged that element (c) is not taught in Buchanan, element (c) is not disclosed in either reference, alone or in combination.

Therefore, in light of all the reasoning presented above, applicants respectfully contend that the Examiner has failed to support a *prima facie* case of obviousness and that independent claims 1, 7, and 13 are patentable. Since dependent claims 2-6, 8-12, and 14-18 are dependent claims reporting directly or indirectly to claims 1, 7, and 13, they are also patentable.

With respect to new independent claims 19, 24, and 29, none of the cited art, alone or in combination teaches:

- (a) maintaining a connection between multiple user stations and a server having a database;
- (b) receiving from one of the user stations a plurality of user input data files;
- (c) receiving a plurality of user-selected keywords, wherein data contained within said user input data files is organized around the keywords;
- (d) selecting a data management template corresponding to the keywords;
- (e) validating that all data to be loaded into the database matches the data management template; and,
- (f) loading the validated data into the database.

The applicants assert that new independent claims 19, 24 and 29 are patentable, and all dependent claims 20-23, 25-28, and 30-33 reporting directly or indirectly to claims 19, 24 and 29 are also patentable.

CONCLUSION

Applicants submit that all pending claims are allowable and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at 650-320-4104. If any fees are due in connection with the filing of this paper, the Commissioner is authorized to charge such fees, including fees for any extension of time, to Deposit Account No. 50-1901 (Reference 60021-340501).

Date: March 10, 2003

Respectfully submitted,

OPPENHEIMER, WOLFF & DONNELLY, LLP

Customer No. 25696

P.O. Box 10356

Palo Alto, CA 94303

Tel: 650.320.4000

Fax: 650.320.4100

By:



Michael K. Bosworth
Reg. No. 28,186

CERTIFICATE OF MAILING (37 CFR 1.8(a))

I hereby certify that this paper (along with any papers referred to as being attached or enclosed) is being deposited with the U.S. Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, Washington, D.C. 20231 on

Date: March 10, 2003

By:



Donna B. Rose

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE SPECIFICATION:

Please amend the specification as follows:

On page 1, line 1, amend the title to read:

[SYSTEM, METHOD AND ARTICLE OF MANUFACTURE FOR] ERROR AND LOAD
SUMMARY REPORTING IN A HEALTH CARE SOLUTION ENVIRONMENT

Please amend the paragraph beginning on page 8, line 3:

A system, method and computer program [article of manufacture] are provided for generating error and summary reports for a data load.[First, a]A plurality of records to be loaded in a database are received. The records may include medical records. A data management template corresponding to the records is chosen.[Next i]It is verified that all records to be loaded match the data management template. All or matching records are sent to a database for loading in the database upon validation that the records match the data management template. A report of records that match the data management template and records that do not match the data management template is compiled.

Please insert the following paragraph on page 8, line 23:

In an further aspect of the present invention, a system, method, and computer program for generating error and summary reports for a data load, while storing user input data files in a multi-tier client/server architecture, are provided. A connection between multiple user stations and a server having a database is maintained. A plurality of user input data files is received from one of the user stations, including a plurality of user-selected keywords, wherein data contained within the user

input data files is organized around the keywords. A data management template is selected corresponding to the keywords. All data to be loaded into the database is validated to match the data management template. The validated data is loaded into the database and a report identifying data that match the data management template and data that does not match the data management template is compiled.

IN THE ABSTRACT:

Please amend the Abstract as follows:

Please amend the title to read:

45 [SYSTEM, METHOD AND ARTICLE OF MANUFACTURE FOR] ERROR AND LOAD
SUMMARY REPORTING IN A HEALTH CARE SOLUTION ENVIRONMENT